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SENT VIA ECF ONLY

Magistrate Judge Steven I. Locke
United States District Court
Eastern District of New York
100 Federal Plaza
Central Islip, NY 11722

Re: Northwell Health, Inc. v. United Welfare Fund, et al.
No.: 21-CV-00020 (GB)(AKT)

Dear Magistrate Judge Locke,

My office represents the plaintiff, Northwell Health, Inc. (Northwell), in the above captioned lawsuit. I submit this Joint Discovery Status Report on behalf of the parties in anticipation of the Discovery Status Conference currently scheduled with Your Honor on May 26, 2022.

The parties have requested several adjournments in connection with this status report and the upcoming conference, and the parties have made headway. Northwell and Defendant United Welfare Fund (UWF) held a claims summit to discuss the disputed claims, and scheduled another claims summit on May 25th. Numerous claims have been resolved to date and the parties hope the progress to continue.

Northwell commenced this case against the defendants predominantly as a result of systematic unpaid or underpaid healthcare claims. Since the Court's initial entry of the scheduling order on September 17, 2021 and the Court's recent order on January 21, 2022, the parties have continued working to resolve or narrowing the claims at issue, and expect to withdraw Northwell's First Cause of Action and part of its Third Cause of Action.

As the parties have focused on resolution, the parties have not finalized written discovery. Northwell believes that it has fulfilled its discovery obligations in connection with UWF's written discovery. UWF has focused its attention on the resolution process to date. Northwell and Defendant Empire Blue Cross and Blue Shield have outstanding written discovery, pending their resolution of Northwell's aforementioned causes of action, which is nearing completion.

Thank you for your time and attention to this matter.

Respectfully submitted,
/s/
Thomas B. Noonan

cc via ECF: all counsel of record